

**CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE**

INITIAL STATEMENT OF REASONS

Hearing Date: No hearing has been scheduled for the proposed action.

Subject Matter of Proposed Regulation: Education and Training/Practice Credits

Sections Affected: 2615 and 2620 of Article 1 of Division 26 of Title 16 of the California Code of Regulations (CCR)

Background and Problem Statement

The Landscape Architects Technical Committee (LATC) licenses landscape architects. As a result of legislative reorganization, the LATC, established on January 1, 1998, replaced the former Board of Landscape Architects and was placed under the purview of the California Architects Board (Board). Business and Professions Code (BPC) section 5630 authorizes the Board to adopt, amend, or repeal rules and regulations that are reasonably necessary to carry out the provisions under the Landscape Architects Practice Act (Chapter 3.5 of Division 3 of the BPC). BPC section 5650 requires candidates seeking licensure in landscape architecture to have six years of combined education and training/practice experience in landscape architecture or related fields, as specified, to qualify for the Landscape Architect Registration Examination (LARE). BPC section 5651 requires the Board, by means of examination, to ascertain the professional qualifications of all landscape architect license applicants and requires the Board to issue a license to every person whom the Board finds to be qualified on payment of the initial license fee.

Currently, 16 CCR section 2620¹, subdivision (b) requires a candidate's six years of combined education and training/practice experience to include at least one year of education credit in landscape architecture and identifies the qualifying degree programs in which a candidate may obtain that education credit. CCR section 2620, subdivision (c) requires a candidate's six years of experience to also include a minimum of two years of training/practice experience in landscape architecture or, as an alternative, two or four years of training/practice experience as a licensed landscape contractor, depending on the degree or certificate held by the candidate with landscape contractor experience. CCR section 2620, subdivision (a) lists the amount of education credit given for various degree programs and the amount of training/practice credit given for experience in specific settings. CCR section 2615, among other things, provides that a candidate who has a combination of six years of education and training/practice experience, as specified, is eligible and may apply for the LARE. CCR section 2615 also provides that a candidate who has a Board-approved degree in landscape architecture, as specified, or an extension certificate in landscape architecture from a Board-

¹ All CCR references are to Title 16 unless otherwise noted.

approved school, as specified, is eligible and may apply for Sections 1 and 2 of the LARE.

The Joint Legislative Sunset Review Committee's (JLSRC) 2010 and 2014² Recommendations and the LATC's subsequent Strategic Plan 2015-16 directed the LATC to review the existing six-year education and training/practice requirements for taking the LARE, identify eligibility issues and propose solutions that not only protect the public health, safety, and welfare of consumers, but also ensure that there are no unnecessary barriers to the landscape architect profession for qualified individuals.

Additionally, the 2017-2018 LATC Strategic Plan contained objectives to expand pathways to both initial and reciprocal licensure by exploring requirements for applicants who have degrees related to the field of landscape architecture, or training/practice experience only.

At its June 15, 2017, meeting, the Board reviewed the current education and training/practice requirements for licensure as a landscape architect and directed the LATC to develop a proposal that amends its reciprocal and initial licensure requirements to mirror those of the Board, where possible, which award credit for related degrees and training/practice experience-only pathways to examination.

Based on research of other states' initial landscape architect licensure requirements, Board staff found that 16 states stipulate in their licensing standards the allowance of any four-year degree and 29 accept accredited civil engineering degrees and provide for training/practice experience-only pathways to examination. (See Underlying Data, November 2, 2017 Meeting Materials.)

In response to the directives given by both the JLSRC and the Board, the LATC is pursuing this regulatory proposal to expand education and training/practice experience pathways to taking the LARE and reduce unnecessary barriers to landscape architect licensure.

Specific Purpose, Anticipated Benefit, and Rationale:

CCR Section 2615 – Form of Examinations

Amend CCR Section 2615, subdivision (a)(2)

Purpose: The purpose of amending CCR section 2615, subdivision (a)(2) is to update references to CCR section 2620, subdivision (a) to reflect proposed amendments to CCR section 2620, subdivision (a) addressed in this proposal.

Anticipated Benefits: The Board anticipates that the minor and technical revisions to CCR section 2615, subdivision (a)(2) will make the examination, education, and training

² The 2014 Sunset Review hearings and recommendations were conducted via a joint effort of the Senate Committee on Business, Professions, and Economic Development and the Assembly Committee on Business and Professions.

requirements easier for candidates to understand and provide a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to maintain consistency across two licensure requirements regulations. CCR section 2615, among other things, provides that a candidate who has a combination of six years of education and training/practice experience, as specified, is eligible and may apply for the LARE. CCR section 2615 also provides that a candidate who has a Board-approved degree in landscape architecture, as specified, or an extension certificate in landscape architecture from a Board-approved school, as specified, is eligible and may apply for Sections 1 and 2 of the LARE. CCR section 2620 provides a table showing the maximum number of education and training/practice credits the Board awards for specified degree programs or training/practice experience. CCR section 2620, subdivision (b) requires candidates to have at least one year of education credit and identifies the qualifying educational programs. CCR section 2620, subdivision (c) requires candidates to have a minimum of two years of training/practice experience in landscape architecture, and CCR section 2620, subdivision (a) lists the amount of credit given for various degree programs and specific training/practice experience.

To reduce barriers to licensure, the LATC recommended to the Board that CCR section 2620 be revised to create alternate pathways to licensure and clarify the accreditation descriptions for four-year degree programs and extension certificate programs. This rulemaking makes these revisions to CCR section 2620. However, CCR section 2615 relies on the degree and certificate program descriptions in CCR section 2620 to establish the requirements for a candidate to be eligible to take the LARE. To conform CCR section 2615 education and training/practice requirements for the LARE with the revised education and training/practice credit requirements in CCR section 2620, this rulemaking makes minor and conforming changes to CCR section 2615, subdivision (a)(2).

CCR Section 2620 – Education and Training/Practice Credits

Amend CCR section 2620, subdivision (a)

Purpose: The purpose of amending CCR section 2620, subdivision (a) is to consolidate the regulation and clarify that this subdivision outlines the education and training/practice experience equivalents used by the Board to evaluate an applicant's education and training/practice experience documentation.

Anticipated Benefits: The Board anticipates that amending CCR section 2620, subdivision (a) to make non-substantive changes that clarify the content of the regulation and maintain consistency with the title of the regulation, will make the examination, education, and training requirements easier for candidates to understand and provide a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to respond to the JLSRC recommendations and LATC's Strategic Plans to review the existing six-year training and education requirements for a license candidate to qualify for the LARE and identify ways to remove unnecessary barriers to landscape architect licensure while maintaining public health, safety, and welfare. The education and training/practice credits may be obtained in a variety of ways, as shown in the education and training/practice experience table in CCR section 2620, subdivision (a). Amendments to this subdivision including moving the phrase "(a) Experience Equivalent:" currently located in that table to the text above the table. The proposal would also reorganize the education credits by grouping them into descending maximum credit order by degrees, extension certificates, and partial degree completion. These amendments provide increased clarity to the regulation.

Amend CCR section 2620, subdivision (a)(1)

Purpose: The purpose of amending CCR section 2620, subdivision (a)(1) is to clarify the provision awarding four years of education credit for a degree in landscape architecture from an approved school.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a clarified education experience description that is easier to read and understand.

Rationale: The proposal is necessary to modify the provision awarding four years of education credit for a degree in landscape architecture from an "approved school" by replacing the reference to an "approved school" with a reference to "a degree program [that] has been accredited by the Landscape Architectural Accreditation Board (LAAB)." BPC section 5650 requires the Board to award a candidate four years of credit for a degree in landscape architecture from "a school of landscape architecture approved by the [B]oard." (CCR § 2620(a)(1).) BPC section 5630 authorizes the Board to "[e]stablish criteria for approving schools of landscape architecture." Accordingly, subdivision (b)(4) of current CCR section 2620 defines "approved school" as a school whose landscape architectural curriculum is approved by LAAB or determined by the Board to be equivalent to a curriculum having LAAB accreditation. To simplify the regulation and accurately reflect current Board practice, the proposal would delete the definition of "approved school" in CCR section 2620, subdivision (b)(4) and revise subdivision (a)(1) to instead award four years of education credit for a degree from a degree program that is accredited by LAAB, and remove the alternative means of Board approval. The Board determined it was necessary to delete the provision regarding an alternative means of Board approval as the Board has not previously reviewed any landscape architecture programs and determined that the curriculum was equivalent to a curriculum having LAAB accreditation. These amendments remove the "guess work" for license candidates who will no longer have to wonder whether their curriculum will be approved by the Board based upon unknown criteria. Accordingly, by providing that the maximum four years of education credit may only be awarded for a degree in landscape architecture from an LAAB-accredited degree program, the amendments to subdivision (a)(1) would simplify a candidate's determination of the amount of credits the candidate will receive for a degree in landscape architecture from a particular degree program.

Amend CCR section 2620, subdivision (a)(2)

Purpose: The purpose of amending CCR section 2620, subdivision (a)(2) is to modify the provision awarding three years of education credit for a degree in landscape architecture from a non-approved school.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a clarified educational experience description that is easier to read and understand.

Rationale: The proposal is necessary to modify the provision awarding three years of education credit for a degree in landscape architecture from a “non-approved school” by replacing the reference to a “non-approved school” with a reference to a “degree program [that] has not been accredited by LAAB,” and requiring the non-accredited program to have at least a four-year curriculum.

Under current CCR section 2620, subdivision (a)(2), a candidate may receive three years of education credit for a degree in landscape architecture from a “non-approved school.” As described above, the proposal would remove the definition of “approved school” in current CCR section 2620, subdivision (b)(4) and revise CCR section 2620, subdivision (a)(1) to instead award four education credits for a degree in landscape architecture from a “degree program [that] has been accredited by the Landscape Architectural Accreditation Board (LAAB).” Because the proposal would effectively redefine “approved school,” for purposes of subdivision (a)(1), as meaning a LAAB-accredited degree program, the proposal would revise subdivision (a)(2) to reflect this change by replacing the reference to a “non-approved school” with a reference to a “degree program that has not been accredited by LAAB.”

To incorporate the degree requirements of subdivision (b)(2) of current CCR section 2620 which defines a degree from a school with a landscape architecture program as either a bachelor’s or master’s degree, the proposal would require a non-accredited degree program in landscape architecture to consist of at least a four-year curriculum for a candidate to receive education credit for a degree from that program.

These amendments remove the “guess work” for license candidates who will no longer have to wonder whether their curriculum will be approved by the Board based upon unknown criteria. Accordingly, by awarding three years of education credit for a degree in landscape architecture from a degree program that is not accredited by LAAB and consists of at least a four-year curriculum, the amendments to subdivision (a)(2) will simplify a candidate’s determination of the amount of education credit, if any, the candidate will receive for a degree in landscape architecture from a particular degree program.

Amend CCR section 2620, subdivision (a)(3)

Purpose: The purpose of the proposal is to decrease barriers to licensure by awarding two years of education credit, instead of one, to individuals with architecture degrees

from accredited programs. In addition, the purpose of the proposal is to reorganize the list of education credits for degrees in descending order from the highest to lowest number of education credits awarded.

Anticipated Benefits: The Board anticipates that license candidates will benefit from the proposal, which would enable individuals with an architecture degree from an accredited program to qualify for the LARE with fewer training/practice credits. The Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public. The Board does not anticipate any reduction in licensee competency as various aspects of the curriculum covered by an accredited architecture program directly relate to the curriculum covered by an accredited landscape architecture program. The Board also anticipates that license candidates will benefit from a clarified list of education and training/practice credits.

Rationale: The proposal is necessary to decrease barriers to licensure and provide an appropriate number of education credits for license candidates with a four-year architecture degree from an accredited program. As discussed at the October 3, 2017, meeting of the Education/Experience Subcommittee of the LATC, 29 other states award education credit for degrees, like architecture degrees, that are related to landscape architecture in terms of what is covered by each respective curriculum, and the Council of Landscape Architectural Registration Board (CLARB), with which the LATC is associated, allows for related degrees in architecture. (See October 3, 2017 Meeting Minutes, p. 3.) The current regulation, in CCR section 2620, subdivision (a)(9), provides only one year of educational experience for a degree in architecture from a degree program that consists of at least a four-year curriculum accredited by the National Architectural Accrediting Board (NAAB). This proposal would renumber CCR section 2620, subdivision (a)(9) as subdivision (a)(3) and revise that subdivision to award two years of education credit, instead of one, for an architecture degree from an NAAB-accredited program that consists of at least a four-year curriculum. In accordance with a majority of other states, and as recognized by CLARB, the proposal would increase the number of education credits from one to two years for an accredited architecture degree, and that license candidate would only need four years of training/practice experience, instead of five, to qualify for the LARE. In this way, the proposal would reduce barriers to licensure for license candidates with a four-year architecture degree.

Adopt CCR section 2620, subdivision (a)(4)

Purpose: The purpose of the proposal is to decrease barriers to licensure by awarding two years of education credit to individuals with civil engineering degrees from accredited education programs.

Anticipated Benefits: The Board anticipates that license candidates will benefit from the proposal, which would enable individuals with a civil engineering degree from an accredited program to qualify for the LARE with fewer training/practice credits. The

Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public. The Board does not anticipate any reduction in licensee competency as various aspects of the curriculum covered by an accredited civil engineering program directly relate to the curriculum covered by an accredited landscape architecture program. The Board also anticipates that license candidates will benefit from a clarified list of education and training/practice credits.

Rationale: The proposal is necessary to decrease barriers to licensure and provide an appropriate number of education credits for license candidates with a civil engineering degree from an accredited program. As discussed at LATC's February 10, 2016, meeting, the regulation is currently unreasonable in that it awards one year of training/practice credit for employment as a registered civil engineer but does not award education credit for civil engineering degrees. (See Underlying Data, February 10, 2016, Meeting Minutes, p. 6.) Further, during the Education/Experience Subcommittee meeting on October 3, 2017, the Subcommittee determined that a civil engineering degree from an accredited program should be granted the same amount of education credit as an architecture degree from an accredited program because the curriculum covered by each similarly relate to the curriculum covered by an accredited landscape architecture degree program. In addition, it was also discussed that 29 other states award education credit for degrees, like civil engineering degrees, that are related to landscape architecture, and CLARB, with which the LATC is associated, allows for related degrees in civil engineering. (See Underlying Data, October 3, 2017 Meeting Minutes, p. 3.)

The current regulation, in CCR 2620, subdivision (a)(11), awards one year of training/practice experience for self-employment as, or employment by, a registered civil engineer, but there is no education credit for a degree in civil engineering. This proposal would award two years of education credit for a civil engineering degree, where the degree program is accredited by the Accreditation Board for Engineering and Technology (ABET). In accordance with a majority of other states, and as recognized by CLARB, the proposal would provide education credits of two years for an accredited civil engineering degree, and license candidates with that degree would only need four years of training/practice experience to qualify for the LARE. In this way, the proposal would reduce barriers to licensure for license candidates with an accredited civil engineering degree.

Adopt CCR section 2620, subdivision (a)(5)

Purpose: The purpose of the proposal is to decrease barriers to licensure by enabling individuals with four-year degrees that are not otherwise listed in CCR section 2620, subdivision (a) to receive one year of education credit for those degrees.

Anticipated Benefits: The Board anticipates that license candidates will benefit from the proposal, which would enable individuals with a four-year degree that is not otherwise

listed in CCR section 2620, subdivision (a) to qualify for the LARE with fewer training/practice credits. The Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public. The Board also anticipates that license candidates will benefit from a clarified list of education and training/practice credits.

Rationale: The proposal is necessary to decrease barriers to licensure and provide an appropriate number of education credits for license candidates with a four-year degree not otherwise listed in CCR section 2620, subdivision (a). At the Board's June 15, 2017, meeting, the Board instructed the LATC to develop a proposal that aligned its reciprocal and initial licensure requirements and, where possible, to mirror those of the Board. (See Underlying Data., July 13, 2017 Meeting Materials, Agenda Item G Memorandum, p. 3.) The Board's education and training/practice experience regulation for architecture licenses, CCR, title 16, section 117, subsection (a)(6) provides one year of education credit for university or college degrees that consist of at least a four-year curriculum and are not otherwise listed in the regulation. However, the current landscape architecture education and training/practice experience regulation does not provide any education credit for degrees that are not otherwise listed in CCR section 2620, subdivision (a).

As discussed at the LATC's Education/Experience Subcommittee meeting on October 3, 2017, 16 other states grant education credit for any bachelor's degree. (See Underlying Data, July 13, 2017 Meeting Materials, Agenda Item G Memorandum, p. 3.) Similarly, this proposal would award one year of education credit for any degree, where the degree program consists of at least a four-year curriculum, which would align with the Board's regulation for architecture licenses. Thus, a license candidate with a degree that is not otherwise listed in CCR section 2620, subdivision (a) would only need five years of training/practice experience to qualify for the LARE. In this way, the proposal would further respond to the JLSRC recommendations and LATC's Strategic Plans to review the existing six-year training and education requirements for a license candidate to qualify for the LARE and identify ways to reduce barriers to licensure for qualified license candidates, specifically those with four-year degrees that are not otherwise listed in CCR section 2620, subdivision (a).

Amend CCR section 2620, subdivision (a)(6)

Purpose: The purpose of amending CCR section 2620, subdivision (a)(4) is to renumber the subdivision as (a)(6) and simplify the regulation by removing references to "associate" and "community college" when referring to degree programs with at least a two-year curriculum.

Anticipated Benefits: The Board anticipates that license candidates will benefit from the ability to obtain one year of education credit for a two-year landscape architecture degree from either a community or city college, and benefit from a clarified description of eligible degrees.

Rationale: The proposal is necessary to clarify education credit for a two-year landscape architecture degree from either a community or city college and to enhance clarity and consistency throughout the regulation. An associate degree in landscape architecture may be obtained from a community or city college; yet, the existing regulation, CCR section 2620, subdivision (a)(4), only provides education credit for an associate degree in landscape architecture from a community college. Accordingly, the proposal would revise the description in CCR section 2620, subdivision (a)(4) to include a degree from a city college by removing the requirement that the degree be “from a community college” and instead refer to this type of degree as a degree in landscape architecture, where the degree program consists of at least a two-year curriculum. The proposal would also delete the language requiring the two-year degree to be an “associate” degree. The proposal would make these revisions to conform the language in CCR section 2620, subdivision (a)(4) with the other references in the regulation to degrees from degree programs with a four-year curriculum. In addition, the proposal is necessary to renumber CCR section 2620, subdivision (a)(4) as subdivision (a)(6) to accommodate new educational experience provisions being inserted above the two-year degree program in descending maximum credit order for degrees.

Amend CCR section 2620, subdivision (a)(7)

Purpose: The purpose of the proposal is to renumber existing subdivision (a)(3) as subdivision (a)(7), simplify that subdivision by removing the reference to “an approved school,” and clarify that Extension Certificate Programs must be approved for Certificate holders to receive education credit.

Anticipated Benefits: The Board anticipates that license candidates will benefit from reorganization of the degrees, extension certificates, and partial completion of education programs in descending credit order and clarified provisions for landscape architect extension certificates.

Rationale: This proposal is necessary to reorganize the list of education credits for degrees, extension certificates, and partial degree completion in descending order from the highest to lowest number of education credits awarded. To accomplish this, the proposal would move existing subdivision (a)(3), regarding landscape architecture extension certificates from an approved school, to new subdivision (a)(7). The proposal would also clarify that an Extension Certificate Program must meet the requirements of CCR section 2620.5, the regulation that sets forth the requirements for an extension certificate program, in order to receive credit. In this way, the proposal would enhance clarity and consistency throughout the regulation and make the regulation easier for license candidates to understand.

Amend CCR section 2620, subdivision (a)(8)

Purpose: The purpose of this proposal is to renumber CCR section 2620, subdivision (a)(5) as new subdivision (a)(8), simplify the regulation by removing “from a university or college”, adding “at least” for continuity throughout subsection (a), and changing “4” to “four”.

Anticipated Benefits: The Board anticipates that the proposal will benefit license candidates by making the education and training requirements easier for candidates to understand and providing a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to reorganize the list of education credits for degrees, extension certificates, and partial degree completion in descending order from the highest to lowest number of education credits awarded. To accomplish this, the proposal would renumber existing subdivision (a)(5), credit for landscape architecture extension certificate with a four-year degree, as new subdivision (a)(8). The proposal would also clarify the landscape architecture extension certificate experience description to remove the lengthy term “from a university or college” and instead describe the degree as a four-year degree. In this way, the proposal would enhance clarity and consistency throughout the regulation and would make the regulation easier for license candidates to understand.

Amend CCR section 2620, subdivision (a)(9)

Purpose: The purpose of this proposal is to renumber existing CCR section 2620, subdivision (a)(6) as new subdivision (a)(9), simplify the regulation by removing the redundant phrase “associate degree from a college,” and modify the sentence structure to align with proposed subdivision (a)(8).

Anticipated Benefits: The Board anticipates the proposal will benefit license candidates by making the education and training requirements easier to understand and providing a clear guide for candidates to determine if they have met examination qualifications. The Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public.

Rationale: This proposal is necessary to reduce barriers to licensure by awarding three years of education credit to candidates who have both a two-year landscape architecture degree from either a community or city college and an extension certificate from an approved program. This proposal is also necessary to renumber existing subdivision (a)(6) and clarify the description of credits provided for an extension certificate with a two-year degree. The existing provision is confusing in that it awards credit for an “associate degree from a college specified in subdivision (a)(4)” (“[a]n associate degree in landscape architecture from a community college which consists of at least a two-year curriculum”) when paired with an extension certificate in landscape architecture from an approved school, but does not award credit for the same degree from a city college when paired with an extension certificate. To reduce confusion, the proposal would renumber the existing section so that it is grouped with the other extension certificate credit provisions. In addition, the proposal would update the cross-reference to subdivision (a)(4) to instead cross-reference new subdivision (a)(6), which will be revised, as described above, to include a two-year degree in landscape architecture from either a community or city college. In this way, the proposal would provide education credit for an extension certificate with either a two-year city college degree or two-year community college degree in landscape architecture. The proposal

would also enhance clarity and consistency throughout the regulation making it easier for license candidates to understand and reduce barriers to licensure for candidates with an extension certificate and two-year city college landscape architecture degree.

Amend CCR section 2620, subdivision (a)(10)

Purpose: The purpose of this proposal is to renumber existing CCR section 2620, subdivision (a)(7) as subdivision (a)(10) and simplify the regulation by clarifying the definition of partial completion of a degree in landscape architecture “from an approved school.”

Anticipated Benefits: The Board anticipates the proposal will benefit license candidates by making the education and training requirements easier for candidates to understand and providing a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to reorganize the list of education credits for degrees, extension certificates, and partial degree completion in descending credit order from the highest to lowest number of education credits awarded. To accomplish this, the proposal would renumber existing subdivision (a)(7), credit for partial completion of an approved landscape architecture degree, as new subdivision (a)(10). The proposal would also clarify the landscape architecture degree description to replace a degree “from an approved school” to become a degree from a program that has been accredited by LAAB to conform with the revisions made to subdivision (a)(1), as described above. In this way, the proposal would enhance clarity and consistency throughout the regulation and would make the regulation easier for license candidates to understand.

Amend CCR section 2620, subdivision (a)(11)

Purpose: The purpose of this proposal is to renumber existing CCR section 2620, subdivision (a)(8) as subdivision (a)(11) and simplify the regulation by clarifying the number of credits awarded to a candidate with a four-year degree in any subject who has also partially completed a landscape architecture extension certificate program.

Anticipated Benefits: The Board anticipates the proposal will benefit license candidates by making the education and training/practice requirements easier for candidates to understand and providing a clear guide for candidates to determine if they qualify for the LARE.

Rationale: This proposal is necessary to reorganize the list of education credits for degrees, extension certificates, and partial degree completion in descending credit order from the highest to lowest number of education credits awarded. To accomplish this, the proposal would renumber existing subdivision (a)(8) as new subdivision (a)(11). The proposal would also clarify that an Extension Certificate Program must meet the requirements of CCR section 2620.5, the regulation that sets forth the requirements for an extension certificate program, in order for credit to be awarded under this subdivision. The proposal would further clarify the description of a four-year degree from

an Extension Certificate Program that consists of “at least” a four-year curriculum. In these ways, the proposal would enhance clarity and consistency throughout the regulation and make the regulation easier for license candidates to understand.

Amend CCR section 2620, subdivision (a)(12)

Purpose: The purpose of the proposal is to reduce barriers to licensure by enabling license candidates to obtain all six years of credits necessary to qualify for the LARE through experience as, or under the direct supervision of, a landscape architect. The purpose of the proposal is also to renumber CCR section 2620, subdivision (a)(10) as subdivision (a)(12) and make minor, non-technical revisions to simplify the regulation.

Anticipated Benefits: The Board anticipates that license candidates will benefit from the proposal, which would create a new experience-only pathway to fulfill the six years of education and training/practice experience requirement for taking the LARE. The Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public. The Board does not anticipate any reduction in licensee competency as such experience, in combination with successful passing of the required licensure examinations, is understood to sufficiently prepare and qualify a candidate for a landscape architect license. The Board also anticipates that license candidates will benefit from a clarified list of education and training/practice credits.

Rationale: The proposal is necessary to decrease barriers to licensure for qualified individuals and provide an appropriate number of training/practice credits for license candidates who do not otherwise have a qualifying degree, extension certificate, or partial completion of a degree or extension certificate. As shown in the list of Initial Licensure and State Specific Reciprocity Requirements table, 27 other states allow for only training/practice experience, without education experience, for a license candidate to qualify for examination. (See Underlying Data., July 13, 2017 Meeting Materials, Attachment H.2.) CCR section 2620, subdivision (a)(10), currently awards a maximum of five years of training/practice credit for self-employment as or employment by a landscape architect licensed in the jurisdiction where the experience occurred. This proposal would renumber the subdivision as (a)(12) to accommodate credit subdivisions added above and award one to six years of training/practice credit for experience as, or experience obtained under the direct supervision of, a landscape architect licensed or registered in the jurisdiction where the experience occurred. In this way, the proposal would reduce barriers to licensure by enabling license candidates who have six years of training/practice experience as, or under the direct supervision of, a landscape architect but no education experience to take the LARE and provides reciprocity provisions for experienced license candidates who may be coming from out of state to be licensed in California who have practiced successfully in other jurisdictions but would otherwise be unable to obtain a California license. The proposal would also replace the references to “self-employment” as a landscape architect and “employment by” a landscape architect with references to “experience” as a landscape architect and “experience obtained

under the direct supervision of a landscape architect. The Board determined this rephrasing is necessary to clarify that candidates do not need to be self-employed or employed by a certifying licensee, however, they must earn experience either as a licensed landscape architect or under the direct supervision of a landscape architect.

The proposal also makes minor, non-substantive revisions to the language to simplify the text for license candidates. Among other revisions, the proposal would delete the provision granting credit “on a 100% basis” for the described experience because the formula for calculating training/experience credit will be specified in CCR section 2620, subdivision (c)(4).

Amend CCR section 2620, subdivision (a)(13)

Purpose: The purpose of the proposal is to reduce barriers to licensure by increasing, from one year to three years, the maximum number of training/practice credits that a candidate may receive for experience as, or under the direct supervision of, a licensed or registered architect or civil engineer. The purpose of the proposal is also to renumber CCR section 2620, subdivision (a)(11) as subdivision (a)(13) and make minor, non-technical revisions to simplify the regulation.

Anticipated Benefits: The Board anticipates that license candidates, especially those using reciprocity provisions to become licensed in California, will benefit from the proposal, which would increase, from one year to three years, the number of training/practice credits a candidate may receive for experience as, or experience obtained under the direct supervision of, an architect or civil engineer. The Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public. The Board does not anticipate any reduction in licensee competency as such experience is closely related to experience in landscape architect and, in combination with successful passing of the required licensure examinations, is understood to sufficiently prepare and qualify a candidate for a landscape architect license. The Board also anticipates that license candidates will benefit from a clarified list of education and training/practice credits.

Rationale: The proposal is necessary to decrease barriers to licensure for qualified candidates and provide an appropriate number of training/practice credits for license candidates with experience as, or experience obtained under the direct supervision of, a licensed or registered architect or civil engineer. As discussed at the October 3, 2017, meeting of the Education/Experience Subcommittee of the LATC, much of the knowledge, skills and abilities acquired through the practice of architecture and civil engineering are related to the practice of landscape architecture and training/practice experience in those fields should receive more credits. (See Underlying Data., October 3, 2017 Meeting Minutes, p. 9.) The current regulation, in CCR section 2620, subdivision (a)(11), provides only one year of training/practice credit for self-employment or employment by a licensed architect or registered civil engineer. This proposal would renumber the subdivision as subdivision (a)(13) to accommodate

education credit subdivisions added above and award up to three years of training/practice credit for experience as, or experience obtained under the direct supervision of, an architect or civil engineer licensed or registered in the jurisdiction where the experience occurred. By providing for increased training/practice credit for architecture and civil engineering experience, the proposal would reduce the number of additional credits a license candidate with more than one year of experience would need to obtain to qualify for the LARE. In this way, the proposal would reduce barriers to licensure for license candidates with more than one year of architecture or civil engineering training/practice experience. The proposal would also replace the references to “self-employment” as an architect or civil engineer and “employment by” an architect or civil engineer with references to “experience” as a landscape architect and “experience obtained under the direct supervision of a landscape architect.” The Board determined this rephrasing is necessary to clarify that candidates do not need to be self-employed or employed by a certifying licensee, however, they must earn experience either as a licensed architect or civil engineer or under the direct supervision of a licensed architect or civil engineer.

In addition, among other minor, non-substantive revisions, the proposal would delete the provision granting credit “on a 100% basis” for the described experience because the formula for calculating training/experience credit will be specified in CCR section 2620, subdivision (c)(4).

Amend CCR section 2620, subdivision (a)(14)

Purpose: The purpose of the proposal is to clarify the provision awarding up to four years of credit for training/practice experience as a licensed or registered landscape contractor in California or another jurisdiction where the scope of practice for a landscape contractor is equivalent to the scope of practice in California. In addition, the proposal is necessary to renumber the existing provision, subdivision (a)(12), to become subdivision (a)(14) to accommodate new education experience provisions being inserted in the education and training/practice experience table.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a clarified training/practice experience description that is easier to read and understand.

Rationale: The proposal is necessary to clarify the landscape contractor training/practice experience that would qualify for up to four years of credit. Currently, CCR section 2620, subdivision (a)(12) awards a license candidate a maximum of four years of training/practice credit, on a 100% basis, for self-employment as a California-licensed landscape contractor or a landscape contractor licensed in another jurisdiction where the scope of practice for landscape contracting is equivalent to the scope of practice in California, as specified in the Contractors’ State License Law (Chapter 9 [commencing with section 7000] of Division 3 of the Business and Professions Code) and corresponding regulations. However, this provision is confusing as to whether the phrase “on a 100% basis” means that the candidate would receive a full four years of

credit for less than four years of work as a landscape contractor. As such, the proposal would clarify that the license candidate could receive up to four years of credit in accordance with the number of years worked as a licensed contractor, as calculated under CCR 2620, subdivision (c)(4). This proposal would also renumber the subdivision as (a)(14) to accommodate education credit subdivisions added above and clarify the provision by removing unnecessary language to conform these provisions with the other training/practice experience provisions in CCR section 2620, subdivision (a) paragraphs (12), (13), and (15). The proposal would also replace the references to “self-employment” as a landscape contractor with a reference to “experience” as a landscape contractor. The Board determined this rephrasing is necessary to clarify that candidates do not need to be self-employed, however, they must earn experience as a licensed landscape contractor.

Adopt CCR section 2620, subdivision (a)(15)

Purpose: The purpose of adopting CCR section 2620, subdivision (a)(15) is to reduce barriers to licensure by awarding up to one year of credit for experience under the direct supervision of a licensed or registered landscape contractor.

Anticipated Benefits: The Board anticipates that license candidates will benefit from the proposal, which would create a new one-year training/practice credit for experience under the direct supervision of a licensed or registered landscape contractor. The Board anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public.

Rationale: The proposal is necessary to decrease barriers to licensure and provide an appropriate number of training/practice credits for license candidates with experience obtained under the direct supervision of a licensed or registered landscape contractor. As discussed at the October 3, 2017, meeting of the Education/Experience Subcommittee of the LATC, some of the knowledge, skills, and abilities acquired through the practice of landscape contracting is related to the practice of landscape architecture. The Board determined that individuals working under the supervision of a landscape contractor would obtain similar knowledge, skills, and abilities required of licensed landscape architects and should receive training/practice credit for that experience. (See Underlying Data., October 3, 2017 Meeting Minutes, pp. 10-12.) At the LATC’s November 2, 2017, meeting, the members discussed the Education/Experience Subcommittee’s recommendation for up to three years of training/practice credit for experience obtained under the direct supervision of a licensed or registered landscape contractor. Public comment opposed that number and recommended only one year of credit because it would be difficult to discern whether someone working for a licensed landscape contractor consistently acquires sufficient experience. (See Underlying Data., November 2, 2017 Meeting Minutes, p. 6.) The LATC members agreed and recommended only one year of training/practice credit for experience obtained under the direct supervision of a licensed or registered landscape contractor. (See Underlying Data., November 2, 2017 Meeting Minutes, p. 8.) With the addition of credit for supervised landscape contractor work, the proposal would reduce barriers to licensure

for license candidates with this type of experience and reduce the number of additional education and training/practice credits a candidate with that experience needs to take the LARE. Additionally, the Board determined that experience earned by individuals working under the supervision of someone “registered in another jurisdiction where the scope of practice for landscape contracting is equivalent to that allowed pursuant to section 7027.5 of the Code and section 832.27 of article 3, division 8, title 16 of the California Code of Regulations” is comparable to experience earned under a California-licensed landscape contractor and should qualify for the same amount of training experience credit.

Amend CCR section 2620, subdivision (a)(16)

Purpose: The purpose of amending CCR section 2620, subdivision (a)(13) is to renumber the subdivision as (a)(16) and simplify the regulation by rewording the description of landscape architecture programs in which candidates may obtain credit for teaching.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a clarified training/practice experience description that is easier to read and understand.

Rationale: The proposal is necessary to clarify the terms of the existing subdivision (a)(13) and renumber the subdivision as (a)(16). Currently, a license candidate may be granted one year of credit for teaching in a landscape architecture degree program offered at an approved school, non-approved school, or community college which consists of at least a two-year curriculum. To simplify the description of the landscape architecture degree program, the proposal would remove unnecessary cross-references to subdivisions describing approved, non-approved, and two-year degree programs and instead, describe the qualifying teaching experience to be obtained where the degree program consists of at least a two-year curriculum. In this way, the proposal maintains the intention of the original regulation while simplifying the language so that it is more inclusive and does not, for example, appear to exclude a two-year city college degree program if the program itself is at least a two-year degree program, while removing unnecessary terms and language. This proposal would also renumber the subdivision as (a)(16) to accommodate education credit subdivisions added above.

Repeal CCR section 2620, subdivision (b)(1)

Purpose: The purpose of repealing CCR section 2620, subdivision (b)(1) is to remove the one-year educational experience requirement to allow for an experience-only pathway to licensure.

Anticipated Benefits: The Board anticipates that license candidates, who otherwise do not have qualifying education experience, will benefit from being able to take the LARE if they have six years of training/practice experience. The Board also anticipates that consumers will benefit from the proposal, which may increase the number of licensed landscape architects available to the public. The Board does not anticipate any reduction in licensee competency as such experience, in combination with successful

passing of the required licensure examinations, sufficiently prepares and qualifies a candidate for a landscape architect license.

Rationale: The proposal is necessary to reduce barriers to licensure for qualified individuals with substantial experience as a landscape architect or related professional but no educational experience. At the Board's June 15, 2017, meeting, the Board instructed the LATC to develop a proposal that aligned its reciprocal and initial licensure requirements and, where possible, mirror those of the Board. (See Underlying Data., June 15, 2017 Meeting Minutes, p. 8; July 13, 2017 Meeting Materials, Agenda Item G Memorandum, p. 3; Meeting Minutes p. 6.) The Board, in its architecture regulations, awards a maximum eight years of training/practice credits for experience as a licensed architect practicing in another United States jurisdiction with a verified record of substantial architectural practice. (16 CCR § 117(a)(13).) As the Education/Experience Subcommittee discussed at its October 3, 2017, meeting, the Board also has an experience-only pathway with a required structured internship program called the Architectural Experience Program (AXP), which is administered by the National Council of Architectural Registration Boards, where key knowledge areas are specified, and a required number of hours are accrued. (October 3, 2017 Meeting Minutes, p. 4.) However, there is no similar internship program for landscape architect license candidates, and it is uncertain whether CLARB will develop such a program. (*Ibid.*) However, the Board determined that the current requirement could pose a possible barrier to licensure to individuals with substantial experience as a landscape architect or related professional but no educational experience. Twenty-nine other states have implemented an experience-only pathway to licensure without a structured internship program. (*Id.*, p. 7.) The Education/Experience Subcommittee determined that the experience-only pathway would be verified through submission of an affidavit of work experience certifying knowledge, skills, and experience. (*Id.*, p. 8.) As such, the proposal would repeal the mandatory one year of education credit to be eligible for the LARE, and license candidates would be able to qualify for the LARE with a variety of training/practice experience obtained through new subdivision (a) paragraphs (12) through (16). This revision of the proposal is intended to remove barriers to licensure for individuals who would not otherwise qualify for the LARE because they have no education experience.

Repeal CCR section 2620, subdivision (b)(2)

Purpose: The purpose of repealing CCR section 2620, subdivision (b)(2) is to eliminate ambiguous degree program descriptions and reduce redundancies within the regulation.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: This proposal is necessary to remove ambiguous language regarding degrees associated with landscape architecture programs and reduce language redundancies in the regulation. Currently, the regulation defines a degree from a

landscape architecture program to mean a Bachelor of Landscape Architecture, Bachelor of Science in landscape architecture, Bachelor of Arts in landscape architecture, or a Master's degree in landscape architecture. However, the existing regulation does not award credit based on degree level, but instead awards credit, in subdivision (a) paragraphs (1) and (2), based on whether the degree in landscape architecture was obtained from an approved school or a non-approved school. Because degree level is immaterial to the determination of credits awarded, a definition enumerating degree levels is unnecessary, and the proposal would remove this definition from the regulation to provide clarity.

Repeal CCR section 2620, subdivision (b)(3)

Purpose: The purpose of repealing CCR section 2620, subdivision (b)(3) is to reduce redundancies within the regulation.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: This proposal is necessary to delete redundant language that provides a maximum education credit of four years for a degree or combination of degrees from an approved school. The deleted language is redundant because the proposal would provide the maximum education credit allowance under proposed subdivision (b)(7).

Repeal CCR section 2620, subdivision (b)(4)

Purpose: The purpose of repealing CCR section 2620, subdivision (b)(4) is to simplify the regulation by removing unnecessary language defining a landscape architecture program approved by LAAB.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: Current subdivision (b)(4) provides that a degree from a school with a landscape architecture program shall be deemed to be approved by the Board if the landscape architectural curriculum has been approved by LAAB as specified in a 2010 accreditation and standards and procedures publication, or the Board determines that the program has a curriculum equivalent to an LAAB-accredited program. Because the proposal would revise subdivision (a) paragraphs (1) and (2) to refer to an LAAB-accredited degree program and a non-LAAB accredited degree program instead of a degree from an "approved" or "non-approved" school, a provision setting forth the conditions for Board approval is no longer necessary. Accordingly, the proposal would repeal the language setting forth those conditions in current subdivision (b)(4).

Amend CCR section 2620, subdivision (b)(5)

Purpose: The purpose of amending CCR section 2620, subdivision (b)(5) is to renumber the subdivision as subdivision (b)(1), update cross-references to subdivision (a), and make minor changes to the language to enhance clarity.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: This proposal is necessary to update the subdivision numbering to reflect the proposed repeal of CCR section 2620, subdivision (b), paragraphs (2) through (4) and to update cross-references to new subdivision (a), paragraphs (10) and (11) to reflect the renumbering outlined in this proposal.

Amend CCR section 2620, subdivision (b)(6)

Purpose: The purpose of amending CCR section 2620, subdivision (b)(6) is to renumber the subdivision as subdivision (b)(2), update cross-references to subdivision (a), and simplify the regulation by removing redundant language.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: This proposal is necessary to update the subdivision numbering to reflect the proposed repeal of CCR section 2620, subdivision (b), paragraphs (2) through (4), update cross-references to new subdivision (a), paragraphs (10) and (11) to reflect the renumbering outlined in this proposal, and remove the redundant phrase “under categories of subdivisions (a), paragraphs (1), (2), (3) or (4) of this section”.

Amend CCR section 2620, subdivision (b)(7)

Purpose: The purpose of amending CCR section 2620, subdivision (b)(7) is to renumber the subdivision as subdivision (b)(3) and simplify the language.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: This proposal is necessary to update the subdivision numbering to reflect the repeal of CCR section 2620, subdivision (b), paragraphs (2) through (4) outlined in this proposal and simplify the regulation by rewording the statement and removing redundant references to subdivision (a).

Amend CCR section 2620, subdivision (b)(8)

Purpose: The purpose of amending CCR section 2620, subdivision (b)(8) is to renumber the subdivision as (b)(4) and clarify the regulation.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand.

Rationale: This proposal is necessary to update the subdivision numbering to reflect the repeal of CCR section 2620, subdivision (b), paragraphs (2) through (4) outlined in this proposal. The proposal is also necessary to clarify the regulation to provide that multiple degrees shall not be granted education credit for more than one degree, except as provided. The existing regulation prohibits additional education credit for multiple

degrees but exempts from this provision the combination of a degree and an extension certificate. The proposal maintains the ability of a license candidate to combine a degree with an extension certificate, under new subdivision (a), paragraphs (8) and (9). Notably, those provisions, as well as the current regulation, do not contemplate considering an extension certificate as a degree. Accordingly, the proposal does not eliminate any existing combination of extension certificate with a degree, and merely clarifies the existing degree combination prohibition. In this way, the proposal provides clarity to license candidates.

Adopt CCR section 2620, subdivision (b)(5)

Purpose: The purpose of adopting CCR section 2620, subdivision (b)(5) is to clarify that candidates cannot obtain education credit for more than one extension certificate.

Anticipated Benefits: The Board anticipates that amending CCR section 2620, subdivision (b)(5) will make the examination, education, and training requirements easier for candidates to understand and provide a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to enhance the clarity of the regulation. The existing regulation does not authorize education credit for a combination of multiple extension certificates. The proposal clarifies the existing regulation by adding new subdivision (b)(5) and clearly stating that a license candidate with multiple extension certificates cannot receive education credit for more than one extension certificate. The Board determined that, except for the specified exceptions, education credit could not be granted for the combination of multiple education programs as such credit would count disproportionately toward the overall six-year experience requirement. The Board seeks to limit education experience granted for multiple extension certificates so that such candidates have at least two years of “real life” experience

Adopt CCR section 2620, subdivision (b)(6)

Purpose: The purpose of adopting CCR section 2620, subdivision (6) is to clarify that candidates with both a degree and an extension certificate cannot obtain credit for both, except as provided in subdivision (a), paragraphs (8) and (9).

Anticipated Benefits: The Board anticipates that adopting CCR section 2620, subdivision (b)(6) will make the examination, education, and training requirements easier for candidates to understand and provide a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to enhance the clarity of the regulation. The current regulation awards a maximum four years of education credit to candidates who have both a four-year degree and an approved extension certificate and awards a maximum two years of education credit to candidates who have both a two-year associate degree and an approved extension certificate. Notably, the regulation does not award education credits to candidates for any other combination of degrees or extension certificates. Therefore, a license candidate who has both a degree that takes

more than four years to obtain (e.g., a Master's degree) and an approved extension certificate may claim four years of education credit under CCR section 2620, subdivision (a)(10) if the degree is from an approved school or four years of education credit under CCR 2620, subdivision (a)(5) if the degree is from a non-approved school and combined with an approved extension certificate, but would be limited to four years of education credit in either case. This proposal maintains those maximum credits and also specifically states, in new subdivision (b)(5), these education credit limitations. In this way, the proposal provides clarity to license candidates of the maximum education credit they will receive for combinations of degrees with extension certificates. The Board determined that, except for the specified exceptions, education credit could not be granted for the combination of multiple education programs as such credit would count disproportionately toward the overall six-year experience requirement.

Amend CCR section 2620, subdivision (b)(7)

Purpose: The purpose of amending CCR section 2620, subdivision (b)(9) is to renumber the subdivision as (b)(7) and simplify the regulation by rephrasing the language.

Anticipated Benefits: The Board anticipates that amending CCR section 2620, subdivision (b)(9) will make the examination, education, and training requirements easier for candidates to understand and provide a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to update the subdivision numbering to reflect changes outlined in this proposal, and to enhance clarity and consistency in the regulation by simplifying and modernizing the language.

Amend CCR section 2620, subdivision (c)(1) sub-paragraphs (A) and (B)

Purpose: The purpose of amending CCR section 2620, subdivision (c)(1) is to reduce redundancies within the regulation by consolidating the language and reduce barriers to licensure by removing the requirement that candidates complete more than one year of training/practice experience as, or under the direct supervision of, a landscape architect licensed in the United States, and by removing the limitation on awarding training/practice credit for experience obtained before completion or partial completion of a degree.

Anticipated Benefits: The Board anticipates that license candidates will benefit from a regulation that is easier to read and understand, while allowing for an experience-only pathway to licensure by enabling candidates to receive training/practice credits without first obtaining education credits.

Rationale: This proposal is necessary to reduce barriers to licensure for qualified individuals with substantial experience as a landscape architect or related professional but no educational experience. The current regulation, in CCR section 2620, subdivision (c)(1)(B), only awards training/practice credit for experience obtained after completion or partial completion of a degree program. As noted above, the Board's determination to allow candidates to combine various forms of acceptable training/practice experience to

meet the six-year experience requirement, as specified in BPC section 5650, required establishing a training/practice experience-only pathway to licensure. However, the limitation in current CCR section 2620, subdivision (c)(1)(B) would foreclose a training/practice experience-only pathway to licensure by preventing candidates from receiving credit for training/practice experience that is obtained before completion or partial completion of a degree program. By deleting this limitation, the proposal would eliminate that obstacle to having a training/practice experience-only pathway to licensure. (See Underlying Data, October 3, 2017 Meeting Minutes, p. 9.) The proposal would also restructure the subdivision to make it easier for license candidates to understand and comply with the regulation.

Amend CCR section 2620, subdivision (c)(1)(C)

Purpose: The purpose of this proposal is to renumber existing subdivision (c)(1)(C) as (c)(2) and clarify the minimum training/practice credit requirement as it applies to candidates who have experience as a landscape contractor.

Anticipated Benefits: The Board anticipates that license candidates will benefit from clarifying the provisions awarding training/practice credit for landscape contractor experience.

Rationale: This proposal is necessary to update the subdivision numbering to reflect changes outlined in this proposal and clarify the provisions awarding training/practice credit for landscape contractor experience. Candidates with a qualifying extension certificate and at least four years of landscape contractor experience are exempt from the provision outlined in current subdivision (c)(1)(B) requiring candidates to possess a minimum number of training/practice credits as, or under the direct supervision of, a landscape architect licensed in a United States jurisdiction. This proposal will retain that exemption and include an additional exemption for candidates who have a qualifying extension certificate and a four-year degree as specified in new subdivision (a)(8) and at least two years of landscape contractor experience. The proposal would include this additional exemption to enable candidates who have less landscape contractor experience, but more educational experience, to meet the minimum training/practice experience requirement in CCR section 2620, subdivision (c)(1) without having to obtain additional experience as, or under the direct supervision of, a landscape architect licensed in a United States jurisdiction.

Amend CCR section 2620, subdivision (c)(2)

Purpose: The purpose of this proposal is to renumber subdivision (c)(2) as subdivision (c)(3) and modernize and simplify the regulation language.

Anticipated Benefits: The Board anticipates that license candidates will benefit from making the training requirements easier to understand and providing a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to update the subdivision numbering to reflect changes outlined in this proposal, and to enhance clarity and consistency throughout

the regulation by simplifying and modernizing the language requiring a license candidate to be at least 18 years of age or a high school graduate before the candidate is eligible to receive training/practice credit.

Amend CCR section 2620, subdivision (c)(3)

Purpose: The purpose of this proposal is to renumber subdivision (c)(3) as subdivision (c)(4) and modernize and simplify the regulation language.

Anticipated Benefits: The Board anticipates that license candidates will benefit from making the training requirements easier to understand and providing a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to update the subdivision numbering to reflect changes outlined in this proposal, and to enhance clarity and consistency throughout the regulation by simplifying and modernizing the language regarding the number of hours of qualifying employment needed to receive one year of training/practice credit, provisions for part-time employment, and training/practice credit for work performed in excess of 40 hours per week.

Amend CCR section 2620, subdivision (d)(1)

Purpose: The purpose of this proposal is to renumber subdivision (d)(1) as subdivision (c)(5) and simplify the language so that all provisions regarding training/practice credits are provided under subdivision (c).

Anticipated Benefits: The Board anticipates that license candidates will benefit from making the training requirements easier to understand and providing a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to update the subdivision numbering to reflect changes outlined in this proposal, and to enhance clarity and consistency throughout the regulation by simplifying and modernizing the language regarding training/practice credit for independent, non-licensed practice or experience.

Amend CCR section 2620, subdivision (d)(2)

Purpose: The purpose of this proposal is to renumber subdivision (d)(2) as subdivision (d) and simplify the language.

Anticipated Benefits: The Board anticipates that license candidates will benefit from making the training requirements easier to understand and providing a clear guide for candidates to determine if they have met examination qualifications.

Rationale: This proposal is necessary to update the subdivision numbering to reflect changes outlined in this proposal, and to enhance clarity and consistency throughout the regulation by simplifying and modernizing the language regarding the Board's ability to purge application records after five years of no license candidate communication or activity.

Underlying Data

1. Joint Legislative Sunset Review Committee (JLSRC), 2010 Recommendations
2. JLSRC, 2014 Recommendations
3. Landscape Architects Technical Committee (LATC), Strategic Plan 2015-16
4. LATC, Strategic Plan 2017-18
5. February 10, 2016 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
6. November 4, 2016 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
7. January 17-18, 2017 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
8. April 18, 2017 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
9. June 15, 2017 California Architects Board (Board) Meeting Agenda; Meeting Materials; and Meeting Minutes
10. July 13, 2017 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
11. October 3, 2017 LATC Education/Experience Subcommittee Meeting Agenda; Meeting Materials; and Meeting Minutes
12. November 2, 2017 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
13. December 7, 2017 Board Meeting Agenda, Meeting Materials; and Meeting Minutes
14. May 4, 2018 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
15. July 20, 2018 LATC Meeting Agenda; Meeting Materials; and Meeting Minutes
16. September 12, 2018 Board Meeting Agenda; Meeting Materials; and Meeting Minutes

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Economic Impact - Overview

The Board has determined that the proposal will not have a significant adverse economic impact on business, based on the following facts: There are approximately 3,740 licensed landscape architects in California. This proposal expands the pathways to becoming a landscape architect by revising the education and training credits necessary for landscape architecture applicants to qualify to take the LARE. The Board does not know the number of persons considering applying to take the LARE. The Board does not register landscape architect businesses, thus the Board cannot estimate the number of businesses that may be impacted, or how many of the potentially impacted businesses are small businesses. The Board does not anticipate the creation or elimination of businesses from this rulemaking. The proposal seeks to decrease barriers to licensure by revising the education and training credits required, which creates alternate pathways for individual license candidates to become eligible for the

LARE. The Board anticipates landscape architect businesses may benefit from a larger pool of licensed landscape architects from which to hire, and thus there may be an expansion of business in California as a result of the proposal.

Benefits

The Board anticipates that the various minor and technical revisions in the rulemaking will make the examination, education, and training regulations easier for candidates to understand and provide a clear guide for candidates to determine if they have met the examination qualifications. The Board has determined this rulemaking will decrease the barriers to landscape architect licensure by expanding education and training pathways to licensure. By increasing the number of licensed landscape architects, the Board anticipates this proposal may benefit the health, safety, and welfare of Californians by increasing landscape preservation, development, and enhancement. The Board anticipates this proposal may benefit both worker safety by increasing the pool of licensed landscape architects that can be hired on landscape architecture jobs. The Board anticipates that this proposal may benefit the state's environment by landscape preservation, development, and enhancement being conducted by licensed landscape architects specifically trained for the task. While difficult to quantify, this proposal improves the quality of life for Californians by creating a larger pool of licensed landscape architects.

The benefits of this proposal stem from BPC section 5651, which requires the Board, by means of examination, to ascertain the professional qualification of all applicants for licenses to practice landscape architecture in California and to issue a license to every person the Board finds to be qualified upon payment of the initial license fee. With this rulemaking the Board seeks to increase the education and training pathways for landscape architecture candidates to take the LARE and thus reduce barriers to licensure.

Economic Impact Assessment

This regulatory proposal will have the following effects:

- It will not create or eliminate jobs within the State of California because it affects the education and training qualifications of landscape architect license candidates for examination and licensure to reduce barriers to licensure.
- It will not create new business or eliminate existing businesses within the State of California because it is aimed at reducing barriers to landscape architect licensure and the Board does not regulate or collect information on landscape architect businesses.
- It may affect the expansion of businesses currently doing business within the State of California because the rulemaking is intended to decrease barriers to

landscape architect licensure by expanding education and training pathways to licensure. By decreasing barriers to licensure, the Board anticipates that landscape architect businesses may benefit from a larger pool of licensed landscape architects from which to hire, and some newly licensed landscape architects may create new businesses.

- This regulatory proposal may benefit the public health, safety, and welfare by decreasing barriers to landscape architect licensure, which may create a larger pool of licensed landscape architects to which consumers would have access.
- This regulatory proposal may benefit worker safety by increasing the number of qualified licensed landscape architects.
- This regulatory proposal may benefit the state's environment by increasing the number of qualified licensed landscape architects.

The Board typically receives approximately 200 initial applications per year. By increasing the pathways to landscape architect licensure for qualified candidates, the Board estimates 10 additional license applicants will be granted licensure per year.

These licensees will be required initial and renewal license and examination fees as follows:

Total Economic Impact of Additional Licensees Per Year													
License Type	Applicants Per Year	Initial Fee Costs	Years Ongoing										
Landscape Architect			1	2	3	4	5	6	7	8	9	10	Total
Initial Application Fee	10	\$35	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$3,500
Supplemental Exam App Fee	10	\$35	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$3,500
Supplemental Exam Fee	10	\$275	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$3,500
Initial License Fee	10	\$400	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$350	\$3,500
Biennial Renewal	Various	\$400	-	-	\$4,000	\$4,000	\$8,000	\$8,000	\$12,000	\$12,000	\$16,000	\$16,000	\$80,000
Total Costs:			\$1,400	\$1,400	\$5,400	\$5,400	\$9,400	\$9,400	\$13,400	\$13,400	\$17,400	\$17,400	\$94,000

Fiscal Impact Assessment

The Board estimates 10 additional initial license applications will be approved per year as a result of the proposed regulations. The Board indicates it takes approximately 3 hours of workload (1 hour – Office Technician (OT) and 2 hours – Staff Services Analyst) to process initial licensure with costs of approximately \$268 per license, and renewal licensure takes approximately 15 minutes of OT workload with costs of approximately \$69 per license as follows:

Workload and Costs Estimates												
License Type	Applicants Per Year	Years Ongoing										
Landscape Architect		1	2	3	4	5	6	7	8	9	10	Total
Initial License	10	10	10	10	10	10	10	10	10	10	10	100
Licensing Workload (1 hour) - Office Technician*		\$800	\$800	\$800	\$800	\$800	\$800	\$800	\$800	\$800	\$800	\$8,000
Licensing Workload (2 hours) - Staff Services Analyst**		\$1,880	\$1,880	\$1,880	\$1,880	\$1,880	\$1,880	\$1,880	\$1,880	\$1,880	\$1,880	\$18,800
Total Initial Costs:		\$2,680	\$2,680	\$2,680	\$2,680	\$2,680	\$2,680	\$2,680	\$2,680	\$2,680	\$2,680	\$26,800
Biennial License Renewal	Various	-	-	10	10	20	20	30	30	40	40	200
Licensing Workload (15 minutes) - Office Technician*		-	-	\$200	\$200	\$400	\$400	\$600	\$600	\$800	\$800	\$4,000
Enforcement-related costs (\$49) per licensee		-	-	\$490	\$490	\$980	\$980	\$1,470	\$1,470	\$1,960	\$1,960	\$9,800
Total Renewal Costs:		-	-	\$690	\$690	\$1,380	\$1,380	\$2,070	\$2,070	\$2,760	\$2,760	\$13,800
Total Initial and Renewal Costs:		\$2,680	\$2,680	\$3,370	\$3,370	\$4,060	\$4,060	\$4,750	\$4,750	\$5,440	\$5,440	\$40,600

*Office Technician (approximately \$80 per hour - includes DCA distributed costs)

**Staff Services Analyst (approximately \$94 per hour - includes DCA distributed costs)

Enforcement Costs (\$179,000)/Licensee Population (3,675) = \$49 per licensee

The Board anticipates additional initial and renewal license fee ranging from \$1,400 to \$17,400 per year and up to \$94,000 over a ten-year period.

Consideration of Alternatives

No reasonable alternative to the regulatory proposal would be either more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome to affected private persons and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.

Set forth below are the alternatives that were considered and the reasons each alternative was rejected:

One option is to keep the status quo, but if the Board does not adopt the proposed amendments, the current education and training/practice barriers to licensure would remain in place, and individuals considered by the Board to be otherwise qualified would continue to have their applications for examination and/or licensure denied based on insufficient educational or training/practice experience.

A second option would be to further expand the allowed education experience description types outlined in CCR section 2620, subdivision (a) to include awarding credit not only for two-year degrees in landscape architecture, but also for two-year degrees in landscape architecture-related and non-related fields; however, the LATC ultimately determined that such degrees do not equip a candidate with enough practical experience to warrant granting credit toward the six-year experience requirement outlined in BPC section 5650. (See Underlying Data, October 3, 2017 Meeting Minutes, p. 6; November 2, 2017 Meeting Minutes, p. 8.)

A third option presented to the Education/Experience Subcommittee was to increase the number of education and training/practice credits required for taking the LARE from six to eight years, consistent with the requirements for licensure as an architect. This option was rejected as it was determined by the Board that six years of experience is currently

sufficient, and an increase would create additional barriers to licensure. (See October 3, 2017 Meeting Minutes, p. 5.)

A fourth option presented to the Education/Experience Subcommittee was to require the experience-only pathway to be part of a structured internship program similar to the Board's Architecture Experience Program administered by the National Council of Architectural Registration Boards. This proposal was rejected, as the Landscape Architecture Experience Program is still only conceptual, not currently administered by the Council of Landscape Architectural Registration Boards, and license candidates are still required to pass the LARE to practice and are responsible for acquiring the necessary knowledge and skills to pass the LARE. (See October 3, 2017 Meeting Minutes, pp. 4, 7-9; November 2, 2017 Meeting Minutes, p. 6.)

A fifth option discussed by the LATC was to require certification of specific skills obtained by license candidates for qualification of training/practice experience. (See November 2, 2017 Meeting Minutes, pp. 6-7, 9.) After the LATC received information that no other states have regulations to require that a candidate obtain any specific skills in order to receive training/practice experience, or that those skills be listed by a certifying supervisor or candidate, the LATC determined not to require a list of specific skills to be performed by the license candidate, and the LATC will review this issue in three to four years to determine whether the public is adequately protected and to consider the examination success rate without having a requirement that a specific license candidates must have a list of skills to qualify for the LARE. (See July 20, 2018 Meeting Minutes, pp 7-8.)

A sixth option considered by the LATC was to include a list of fields related to landscape architecture in which a license candidate could obtain a degree and qualify for education experience. The Education/Experience Subcommittee recommended including non-accredited architecture, non-accredited civil engineering, urban planning and design, city and regional planning, environmental design, parks and natural resource management, landscape planning, landscape planning and design, and landscape design. (See October 3, 2017 Meeting Minutes, pp. 5-7; November 2, 2017 Meeting Materials, Attachment H.5, p. 3.) At the LATC's November 2, 2017 meeting, concern was raised about accepting these types of degrees as educational experience without LATC review of the curricula provided these license candidates. (See November 2, 2017 Meeting Minutes, p. 7.) The option to list related degrees was rejected by the LATC because the same degree at one college could consist of different courses at a different college, and it could take years to research and review all the curriculum. (*Id.*, p. 8.) Accordingly, the Education/Experience Subcommittee's list of related degrees was removed, and those degrees would be given credit as non-related degrees. (*Ibid.*)